

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DANNY SEARLES, by his mother,
and next friend Susan Searles,
SUSAN SEARLES, and
GLEN SEARLES,
Plaintiff,

v.

DEBORAH STONE,
PHYLLIS JEWETT, and
GROTON-DUNSTABLE REGIONAL
SCHOOL DISTRICT
Defendants.

C.A. No. 05-11815-MLW

**JOINT MOTION TO IMPOUND AND HOLD AS CONFIDENTIAL THE PETITION
FOR APPROVAL OF SETTLEMENT UNDER M.G.L. c. 231, § 140C ½, PURSUANT TO
LOCAL RULE 7.2**

Now come all parties in the above-captioned matter and hereby jointly move that this Honorable Court impound and hold as confidential the Petition for Settlement Under M.G.L. c. 231, § 140C ½, and all attachments hereto pursuant to Local Rule 7.2. As grounds therefor, the parties state as follows:

1. On August 1, 2006, the parties participated in a mediation before the Court (Bowler, U.S.M.J.). Following the mediation, the parties reached an agreement on a settlement relative to all claims in the above-captioned case.

2. As part of this settlement, it was agreed by the parties that the settlement terms and conditions would be subject to a confidentiality provision.

3. Because this case involves the claims of a minor plaintiff, the parties wish to seek court approval of the settlement pursuant to M.G.L.c.231, § 140C ½.

4. On August 15, 2006, this Honorable Court will hold a hearing on plaintiffs' Petition for Approval of Minor Settlement. In order to comply with the intent of the parties to keep this settlement confidential, it is imperative that the Court allow the parties motion to impound the Petition for Approval of Minor Settlement and all attachments thereto, as said documents disclose and detail the terms of the parties' settlement.


5. The Petition and attachments should be impounded indefinitely or until such time as ordered by the Court, as the facts and circumstances involving settlement is of a personal and sensitive nature. The parties further recommend that the Petition for Approval of Minor Settlement and attachments be held in escrow with defendants' counsel.

6. No parties will be prejudiced by allowance of this Joint Motion, since confidentiality was contemplated as part of the settlement agreement.


WHEREFORE, the parties respectfully request that the Court allow this Joint Motion by impounding the Petition for Approval of Minor Settlement and all attachments thereto indefinitely, or until such time as ordered by the Court.

Respectfully submitted,

The Plaintiff,
By his attorney
RAVECH & ROY, P.C.


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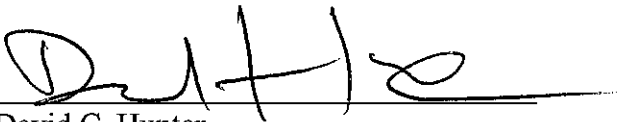
The Defendants,
By their attorneys,
PIERCE, DAVIS & PERRITANO, LLP


John J. Davis, BBO # 115890
David C. Hunter, BBO #647686
Ten Winthrop Square
Boston, MA 02110
(617) 350-0950

CERTIFICATE OF SERVICE

I, David C. Hunter, hereby state that I served a copy of the *Joint Motion to Impound and Hold as Confidential the Petition for Approval of Settlement Under M.G.L. c. 231, § 140C ½ Pursuant to Local Rule 7.2*, via electronically.

Jeffrey N. Roy, Esquire
Ravech & Roy, P.C.
One Exeter Plaza
699 Boylston Street
Boston, MA 02116



David C. Hunter

Dated: August 14, 2006